

# Fact Sheet



## For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the Fact Sheet corresponding with the Title V operating permit issued on August 31, 2010.

Permit Number: **R30-07300003-2010**  
Application Received: **February 14, 2014**  
Plant Identification Number: **03-54-07300003**  
Permittee: **CYTEC Industries Inc.**  
Facility Name: **Willow Island Plant**  
Manufacturing Unit: **Polymer Additives (Part 4 of 4)**  
Mailing Address: **1 Heilman Avenue, Willow Island, WV 26134-9801**

Permit Action Number: *MM08*      Revised: *June 2, 2014*

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Physical Location:	Willow Island, Pleasants County, West Virginia
UTM Coordinates:	474.00 km Easting • 4,356.00 km Northing • Zone 17
Directions:	From Interstate 77, Exit 179, take State Route 2 north for approximately 10 miles. Plant site is on the left (river side) of State Route 2, two miles south of Belmont, WV.

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### Facility Description

CYTEC Industries is a global, research-based specialty chemical company. The company operates a multi-product, multi-process chemical plant at Willow Island, WV. The Polymer Additives Manufacturing Unit manufactures ultraviolet light absorbers, antioxidants and anti-static agents. The light absorbers are used in all types of plastics (bottles, telephones, lawn furniture, auto parts), in coatings, and in sunscreens. Antioxidants are used in man-made fibers, rubber products, plastics, and in medical applications. Anti-static agents are used in the electronics industry, in copy machine toner, and in textile applications.

### Emissions Summary

There is no change in emissions associated with this minor modification.

## Title V Program Applicability Basis

With the proposed changes associated with this modification, this facility maintains the potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single hazardous air pollutant (HAP), and over 25 tons per year of aggregate hazardous air pollutants (HAPs). Due to this facility's potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single hazardous air pollutant (HAP), and over 25 tons per year of aggregate hazardous air pollutants (HAPs), CYTEC Industries Inc. is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

## Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

The modification to this facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR13	Permits for construction/modification
	45CSR30	Operating permit requirement.
State Only:	None	

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

## Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit ( <i>if any</i> )
R13-2156T	March 19, 2014	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

## Determinations and Justifications

CYTEC is required by Title V permit condition 4.5.4. to submit written notification of any revisions of the Building 82 (Polymer Additives) Manufacturing Unit equipment/emission units, control devices or emission points as listed in Sections 1.0, 4.1.4, and 4.1.14, or Appendix A of the permit, by August 15<sup>th</sup> for the calendar semi-annual time period of January 1<sup>st</sup> through June 30<sup>th</sup>, and by February 15<sup>th</sup> for the calendar semi-annual time period of July 1<sup>st</sup> through December 31<sup>st</sup> in which the revision occurred. On February 14, 2014, CYTEC submitted a combined application for a Class I administrative update and a Title V permit minor modification to incorporate changes which have occurred in the second half of 2013.

The table below gives the section in the NSR permit, corresponding section in the operating permit, and provides discussion explaining the specific changes made during the modification.

R13-2156T	Title V	Discussion
1.0	1.1	<ul style="list-style-type: none"><li>Added Tank 261X to the "Product/Process Area-Depressants."</li><li>Added Tank 23SX to the "Product/Process Area-UV2126" section.</li><li>The Emission Point ID for Tank 23SX was changed from "23SX" to "25JE" in the "Product/Process Area-Triazines Solids (UV1164)" section.</li></ul>
4.1.6	4.1.4	Changed Emission Point ID 22QE to 22GE for source ID 22GX (3-22D1) in the Product/Process Area-UV2126 to correct typographical error.
4.1.17	4.1.14	Removed Equipment ID 261X from Table 4.1.14 Intermittent Use Equipment.
Appendix A	Appendix A	Descriptions of control devices 041C and 041S revised by adding "HCl Storage".

Additional changes to this permit are as follows:

- Condition 3.1.8 addresses the Risk Management Plan. This language was changed, upon the request of the permittee. Previous language stated that the facility was subject to Part 68. However, the permittee has indicated that the facility is not. Therefore the permit condition was revised to require a Risk Management Plan should the facility become subject to Part 68.
- Upon the request of the permittee, "Control Devices 06EC and 10CC" were renamed "Recovery Devices 06EC and 10CC" in condition 4.2.6. Also, Recovery Device 12CC was added to this permit condition.

## Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

None.

## Request for Variances or Alternatives

None.

## Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

### **Comment Period**

Beginning Date: Not Applicable for minor modifications.  
Ending Date: N/A

All written comments should be addressed to the following individual and office:

Rex Compston, P.E.  
Title V Permit Writer  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304

### **Procedure for Requesting Public Hearing**

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

### **Point of Contact**

Rex Compston, P.E.  
West Virginia Department of Environmental Protection  
Division of Air Quality  
601 57<sup>th</sup> Street SE  
Charleston, WV 25304  
Phone: 304/926-0499 ext. 1209 • Fax: 304/926-0478

### **Response to Comments (Statement of Basis)**

NA